

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMMONWEALTH OF PENNSYLVANIA
By MICHELLE A. HENRY, Attorney
General,

Plaintiff,

v.

PROSPECT MEDICAL HOLDINGS, INC.,
PROSPECT CROZER, LLC, LEONARD
GREEN AND PARTNERS, SAMUEL LEE,
Individually, and DAVID TOPPER,
Individually,

Defendants.

Case No.: 2:24-cv-05853

STIPULATION AND ORDER

Plaintiff Commonwealth of Pennsylvania and Defendants Prospect Medical Holdings, Inc. and Prospect Crozer, LLC (together, "Prospect"), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, the Complaint was filed on October 28, 2024 and removed to federal court on October 31, 2024;

WHEREAS, Plaintiff and Prospect have subsequently met and conferred about the case and a potential briefing schedule;

WHEREAS, Plaintiff and Prospect agree as follows:

IT IS THEREFORE STIPULATED AND AGREED that

1. On or before December 5, 2024, Prospect will respond to the Motion for Preliminary Injunction and Motion for Appointment of Receiver.

2. On or before December 16, 2024, Plaintiff will file any reply to Prospect's response. On or before December 23, Prospect may file any sur-reply.

3. The parties will thereafter jointly request a date for hearing and argument on the Motions.

4. Prospect's time to answer, move, or otherwise respond to the Complaint shall be enlarged to December 5, 2024.

5. Prospect shall remain subject to all statutory conditions, *e.g.*, 72 P.S. § 1730-H(5)(vii), regarding hospital services and specialties.

Dated: November 12, 2024
Philadelphia, Pennsylvania

<p>COMMONWEALTH OF PENNSYLVANIA OFFICE OF ATTORNEY GENERAL</p> <p><i>Mark Pacella</i> /cm James A. Donahue, III, First Deputy Attorney General Mark Pacella Executive Deputy Attorney General 1600 Arch Street Suite 300 Philadelphia, PA 19103 <i>Counsel for Plaintiff</i></p>	<p>DUANE MORRIS LLP</p> <p><i>Luke P. McLoughlin</i> Alan C. Kessler Luke P. McLoughlin 30 South 17th Street Philadelphia, Pennsylvania 19103 Phone: 215.979.1000 <i>Counsel for Defendants Prospect Medical Holdings, Inc. and Prospect Crozer, LLC</i></p>
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SO ORDERED:

United States District Judge